IN THE UNITED STATES DISTRICT COURT

	HERN DISTRICT OF OHIO 'ERN DIVISION
UNITED STATES OF AMERICA,	) INDICTMENT No.
Plaintiff,	JUDGE GAUGHAN H
v.	) CASEN 5: 20 CR 252
MATTHEW C. DADLOW	Title 18, United States Code,
MATTHEW G. BARLOW,	) Sections 2251(a), 2252(a)(1), and 2252A(a)(5)(B)
Defendant.	)

## COUNT 1

(Transportation of Child Pornography, 18 U.S.C. § 2252(a)(1))

The Grand Jury charges:

1. From on or about February 23, 2016 through on or about June 30, 2016, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant MATTHEW G. BARLOW did knowingly transport child pornography, that is, visual depictions of a minor engaged in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Section 2252(a)(1).

## COUNT 2 (Sexual Exploitation of Children, 18 U.S.C. § 2251(a))

The Grand Jury further charges:

2. From on or about April 7, 2016 through on or about May 21, 2016, in the Northern District of Ohio, Eastern Division, Defendant MATTHEW G. BARLOW did use, persuade, induce, entice and coerce a minor (to wit: Minor Victim #1, whose identity is known to the Grand Jury) to engage in sexually explicit conduct, as defined in Title 18, United States

Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct and such visual depiction was produced or transmitted using materials that had been mailed, shipped, and transported in or affecting interstate or foreign commerce by any means, including by computer, in violation of Title 18, Section 2251(a), United States Code.

## **COUNT 3**

(Transportation of Child Pornography, 18 U.S.C. § 2252(a)(1))

The Grand Jury further charges:

3. From on or about October 1, 2019 through on or about April 4, 2020, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant MATTHEW G. BARLOW did knowingly transport child pornography, that is, visual depictions of a minor engaged in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Section 2252(a)(1).

## COUNT 4

(Possession of Child Pornography, 18 U.S.C. § 2252A(a)(5)(B))

The Grand Jury further charges:

4. On or about April 9, 2020, in the Northern District of Ohio, Eastern Division,
Defendant MATTHEW G. BARLOW did knowingly possess an LG cellphone that contained
child pornography as defined in Title 18, United States Code, Section 2256(8), which child
pornography had been shipped and transported in interstate and foreign commerce by any means,
including by computer, and which was produced using materials which had been shipped and
transported in interstate and foreign commerce by any means, including by computer, and at least

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one image involved in the offense involved a prepubescent minor or a minor who had not attained 12 years of age, in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.